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March 9, 2015

**VIA ECF**

Honorable A. Kathleen Tomlinson, U.S.M.J.  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Courtroom 910  
Central Islip, NY 11722

Re: Cumberland Farms, Inc., et al. v. Medford Development Corp., et al.  
Case No.: 2:15-cv-00580 (LDW)(AKT)

Dear Judge Tomlinson:

This firm represents Plaintiff Cumberland Farms and Gulf Oil Limited Partnership ("Gulf") in the above-captioned matter. I apologize for any confusion regarding my letter of March 6, 2015. The tentative global settlement in this case would include dismissal of this action by Gulf to enforce certain guarantees by the principal of the bankrupt entities.

The tentative settlement is somewhat complex and includes individual agreements by and among certain parties in addition to the primary agreement. We should have clarity on the parties' progress by March 13, 2015. As defendants have not yet entered an appearance on ECF, Gulf therefore respectfully request that all deadlines and hearings be adjourned and held in abeyance pending final resolution of the underlying matters.

Respectfully submitted,

/s/ Bruce S. Rosen  
Bruce S. Rosen

BSR/ckc  
Enclosure  
cc: all counsel on record (via ecf)